



Privacy Statement for Job Applicants

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1. Introduction

Your personal data is in safe hands with us. As a potential job candidate, you must be secure in the knowledge that we do everything we can to protect your data. We comply with all the relevant laws and regulations as set out in 1.1 below. This Privacy Statement for the Recruitment and Selection process (referred to below as the 'R&S process') explains how your data is processed.

1.1 Rabobank Dublin is bound by the applicable rules regarding personal data processing.

- General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- The Law Enforcement Directive is transposed into Irish law by the Data Protection Act 2018
- Data Protection Acts 1988 and 2003
- "ePrivacy Regulations" (S.I. No. 336 of 2011, under which the ePrivacy Directive 2002/58/EC (as amended by Directive 2006/24/EC and 2009/136/EC) was transposed into Irish law)
 - Rabobank Privacy Code

1.2 What do we mean exactly by 'personal data' and the processing of this data?

- Personal data refers to data which relates to you personally, either directly or indirectly. This might include:
 - Your name and address, date of birth, sex, telephone number and email address
 - Your CV and cover letter
 - Links to your public profiles on websites such as LinkedIn
 - Optional: a photograph and/or audiovisual job application video
- Processing refers to any activity involving personal data. When you apply for a job with us, we collect, use and retain your personal data. We do this, among other things, to verify that you hold the qualifications required for the position.

1.3 Whose personal data do we process, and how do we process it, during the job application process?

This Privacy Statement applies to all processing of the personal data of candidates and potential candidates as part of the R&S process at Rabobank Dublin. The data is processed in the HR system in Ireland by or on behalf of Rabobank Dublin. If you are hired by Rabobank Dublin, you will be subject to the Privacy Statement for Employees.

1.4 Who is responsible for processing my personal data?

Rabobank Dublin is responsible for processing all personal data processed by or on behalf of Rabobank Dublin. In this statement, 'Rabobank Dublin' refers to: **a branch of Coöperatieve Rabobank U.A., registered with the Chamber of Commerce under number 30.046.259, with its registered office in Amsterdam, the Netherlands,**

Our contact details are:

Rabobank Dublin, George's Dock House, 2 George's Dock, International financial Services Centre, Dublin 1. Do1H2T6

1.5 How do we obtain your personal data?

We have two ways of acquiring your personal data:

- You provide this yourself or through a third party/third parties (either through referees or an external recruitment agency).
- We also collect data (including contact details) ourselves through resources such as CV databases. We do this if we think you might be interested in working for Rabobank Dublin. If the recruiter contacts you, they will tell you where they found your details. In addition, they will ask you for permission to use these details to contact you regarding a Rabobank Dublin job opening or event. It goes without saying that you can change or revoke your consent at any time.

2. Principles and purposes of processing personal data relating to a job application

We process your data:

- based on your express consent – which, of course, can be revoked at any time;
- if we have a statutory obligation to do so;
- in order to enter into an employment contract with you and subsequently perform this contract;
- based on a legitimate interest on Rabobank Dublin's part.

2.1 For what purposes do we process personal data?

We process personal data for the following purposes:

a. Human resources

We require your personal data in order to be able to properly conduct our R&S process. This includes assessing whether you are suitable for the position and whether we would like to invite you for an interview. Another reason might be to produce an access card, which you require in order to enter the building. Rabobank Dublin pursues a diversity policy because we want our employees to reflect the larger society.

b. Health, safety, security and ethics (including pre-employment screening)

Like all other financial institutions in Ireland, Rabobank Dublin subjects future employees to a background check. We are required by law to do so. Our screening procedures apply to all applicants who are potential Rabobank Dublin employees. We attempt to ascertain as accurately as possible whether you, as an applicant to the bank, are sufficiently trustworthy. A positive outcome of the background check is, obviously, a condition for getting hired. All applicants to be screened are subject to the same procedure, which consists of the following two stages:

- Stage 1: the original version of your highest qualification will be verified during the job interview.
- Stage 2: if we intend to enter into an employment contract with you, we will ask you to complete a statement; this statement advises you that we will be gathering information on you.

This includes the opinions of employers or clients you have had over the past two years regarding your trustworthiness.

We may also use data for this purpose which we obtain from third parties, including former employers (through references we received from you) and recruitment agencies. We may also consult public sources during the job application process, including publicly accessible and professional social media (if this is relevant to the position and is specified in the job advert).

We also record personal data in order to protect the interests of our employees, visitors, the bank and the financial sector. We do this, among other things, through the camera security system.

c. Business reports and analysis and organizational development

We may process your data to create business reports, surveys and analyses. We may also merge the various data we possess on you, for example to improve the R&S reports (e.g. the number of job openings, number of

applicants and the time it takes to fill these vacancies). The results of the analyses and the resulting recommendations can never be traced back to you.

d. Statutory requirements

We collect data relating to you based on specific domestic and international laws and regulations (see 1.1 above).

e. Protection of job applicants' vital interests

We may process data in order to protect your vital interests, e.g. your medical details. Suppose you are in acute danger (and have lost consciousness) and are no longer able to give consent for your medical details to be shared. In this case, these details are vital in order to be able to provide you with immediate assistance.

3. Do we also process special categories of personal data?

By 'special categories of personal data', we mean various types of sensitive data. This data may relate to a person's health, criminal record, and data regarding race or ethnic background. We participate in the *incident registers and alert systems* for the financial industry and may process criminal-law data for this purpose. The purpose of incident registers and alert systems is to protect the interests of financial institutions, of you as a job applicant, and of our customers. One of the ways in which we do this is through fraud detection. If you ask us to record special categories of personal data relating to you or are disclosing this data yourself, we will only process this data if there is a clear purpose, there are grounds to do so, and this is necessary for the purpose. Special categories of personal data may also be processed, for example photographs or video recordings of you. This includes any pictures you might have enclosed with your CV, as well as camera footage recorded of you on entering the building. We process this camera footage solely for the protection of the property of Rabobank Dublin and its employees, and for other security reasons.

4. How do we handle your personal data?

Your personal data is used exclusively by employees who require access to this data on account of their position. The employees who are involved in your application process are bound by confidentiality. We only reuse data if the original data is related to the new purpose.

5. How do we deal with third parties?

Sometimes we engage the services of third parties, which process personal data on our behalf. This includes external recruitment agencies (e.g. CPL, Sigmar) and research companies. We can only engage third parties if this suits the purpose for which we processed your personal data and this is sufficiently reliable. Furthermore, we will only hire the services of such a third party or parties if they have implemented the appropriate security measures and guarantee confidentiality. If your application process includes an assessment, we will notify you in advance and will only save the report to your job application file once you have approved the accompanying report.

6. How long do you keep my details?

If you created an online profile with us, you will be able to use it again for other job applications at Rabobank Dublin in the future. We will not be able to view your data any more at that stage. If your job application was unsuccessful, we will delete your personal data within 1 year of completing the application process. This includes all application details, e.g. your job application letter, CV, email exchange, and the results of background checks and/or assessments, if applicable. If we do need to retain your personal data for a longer period of time, e.g. for future job vacancies, we will ask for your consent. You can revoke this consent at any

time. We will delete your data within 12 months from completion of application process. If you are joining Rabobank Dublin, we will keep the job application file seven years following your termination of employment.

The data recorded on you as part of the sourcing process is deleted as soon as possible once it is no longer relevant to the purpose. If you and the bank have not been in contact for 1 year, we will delete all your personal data automatically.

7. What rights do you have in relation to your personal data?

7.1 Right of access

You may ask us to view the data Rabobank Dublin has stored in relation to you, including your public online details and your uploaded CV and cover letter.

7.2 Right of rectification

If your data is incorrect, incomplete or in violation of the law, you can request us to have it rectified.

7.3 Right to be forgotten

You can ask that data recorded in relation to you be deleted if you object to this data being processed. This might be the case, for example, if the processing is unlawful or no longer necessary for the purposes for which it was collected.

7.4 Right to restrict processing

In some cases, you may request that the processing of your personal data be restricted. This means that a smaller amount of data is processed (this is the case, for example, when your CV is updated).

7.5 Right not to be subject to automated decision-making

'Automated decision-making' refers to decisions made by computers rather than people. Rabobank Dublin is permitted under the law to make automated decisions, including profiling. We currently do not use automated decision-making in the job application process.

7.6 Right to data portability

Data which has been provided to us based on an agreement and/or with your consent may be transferred to a third party. This can be facilitated only if it is technically feasible. Rabobank Dublin will transfer the data you have provided yourself in a structured and readable format.

7.7 Right to object

You have the option to object to the processing of your personal data. In this case, we will make a reassessment in order to verify that it is accurate that your data can no longer be used for this purpose. We will also always inform you of our decision. If the decision is unacceptable to you, you can submit a complaint to the privacy coordinator at Rabobank Dublin or the Data Protection Commission in Ireland.

7.8 Procedure

If you submitted one of the requests described above, we will respond to your request within one month of receipt. Depending on the number of requests received and the complexity of the request(s), the period may be extended by another two months. We will, of course, keep you updated on the progress of your request. If the data you provided also contains third-party data, such third party may be requested in advance whether they object to their data being processed. You may be asked to further specify your request. We may also ask you to provide ID because we want to make certain that we are providing data to the right person. In some

cases we may not be able to honour your request. For example, we will not delete the data if it is of significant importance to us or if there is a statutory obligation to retain it. We will notify you if this is the case.

8. Where can I address my question or complaint?

For questions or complaints about the processing of personal data, you can contact the division to which you applied or the Rabobank Dublin HR Department, who can be reached via email at fm.ie.hr@rabobank.com.

If the response is unsatisfactory, you may submit your complaint to the Rabobank Dublin privacy coordinator, who can be reached via email at [fm.ie.Dublin.Compliance <fm.ie.Dublin.Compliance@rabobank.com>](mailto:fm.ie.Dublin.Compliance@rabobank.com). You can also ask questions or submit a complaint to the Data Protection Commission.

9. Can we amend our Privacy Statement?

The Privacy Statement may be modified from time to time. If there is new data to be processed, we will amend the Privacy Statement accordingly. You will be able to find the most up-to-date version of our Job Applicants Privacy Statement on our website, along with previous versions of this Statement.